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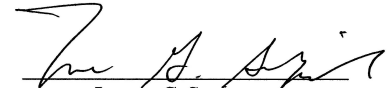
August 28, 2023

**VIA ECF**

Hon. Judge Lorna G. Schofield  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Application Granted in part. Defendants' motion(s) shall be filed by **November 3, 2023**. The Government's response shall be filed by **December 22, 2023**. Defendants' reply shall be filed by **January 12, 2024**. The November 13, 2023, conference will proceed as scheduled. The Clerk of the Court is directed to terminate the letter motion at docket number 64.

Dated: September 5, 2023  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Re: **United States v. Liaquat Cheema, et al., 22-CR-00615(LGS)**  
**Unopposed Request for Modification of Scheduling Order**

Dear Judge Schofield:

On behalf of defendant Ali Cheema and all other defendants (together, the "Defendants") in the above-captioned action, we respectfully request that Your Honor modify the scheduling order of June 2, 2023 (ECF No. 61), for the reasons set forth below. We have conferred with counsel for the Government, who does not oppose our request and consents to our proposed due dates. The Defendants and the Government respectfully request that the Court exclude time under the Speedy Trial Act, as set forth below.

Defendants respectfully request that the scheduling order be modified by extending the existing due dates, as follows:

Event	Previous Due Date	Proposed New Due Date
Defendants' Motions	September 6, 2023	Friday November 3, 2023 (58 days from September 6, 2023)
Government's Responses	October 6, 2023	Friday December 22, 2023 (77 days from October 6, 2023)
Defendants' Replies	October 20, 2023	Friday January 12, 2024 (84 days from October 20, 2023)
Status Conference	November 13, 2023, at 10:30 AM	Whichever date Your Honor deems appropriate

As Your Honor knows, the Court appointed Julie de Almeida as Coordinating Discovery Attorney ("CDA") on February 10, 2023, to help process and facilitate the voluminous discovery in this case. See ECF No. 55. On June 1, 2023, Ms. de Almeida provided counsel for Defendants with a searchable hard



drive containing roughly 5 million files provided by the Government in discovery. On June 21, 2023, Ms. de Almeida conducted a training session instructing Counsel for the Defendants regarding how to use the discovery hard drive. Notwithstanding Ms. de Almeida's training, navigating the voluminous discovery using an unfamiliar system has been an arduous and time-consuming process.

In light of the difficulties associated with reviewing and analyzing the extensive discovery, Defendants respectfully request additional time in order to adequately review the discovery prior to the upcoming due date for Defendants' motions.

The proposed dates above also reflect that undersigned counsel has a criminal trial set before Judge Rakoff beginning on September 19, 2023, which is expected to last approximately two weeks, and that counsel for the Government has a criminal trial set before Judge Gardephe beginning on November 27, 2023, which is expected to last at roughly two weeks (possibly longer).

This is Defendants' third request to modify the scheduling order seeking additional time, which the Court previously granted (*See* ECF Nos. 59 and 61). We have conferred with counsel for the Government, who does not oppose our request.

Should Defendants determine that we may need additional time to prepare motions, we will seek a further modification at the appropriate time, setting forth the bases for any such request.

Defendants and the Government respectfully request that the Court exclude time under the Speedy Trial Act between November 13, 2023 until the date set by the Court for the status conference. The Court previously excluded time until November 13, 2023. *See* ECF No. 61. The ends of justice served by excluding the time outweigh the best interests of the public and the Defendants in a speedy trial as provided in [18 U.S.C. § 3161\(h\)\(7\)\(A\)](#) because it will allow time for the Defendants to review discovery, contemplate the filing of any motions, and engage in discussions of potential resolutions of this case.

Thank you for Your Honor's consideration, and we remain available to discuss any questions Your Honor may have.

Respectfully submitted,

Crowell & Moring LLP

A handwritten signature in cursive script that reads 'Kelly T. Currie'.

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*Attorneys for Defendant Ali Cheema*

cc: Timothy Capozzi, Esq., counsel for the Government (by ECF)  
All defense counsel (by ECF)